

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

JOSTIN ARTHUR DESCO

Case No. 20-mj-30379

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

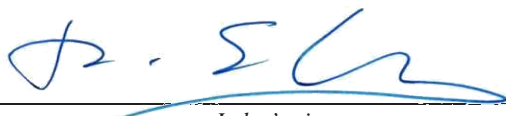
On or about the date(s) of June 2018 through September 11, 2020 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 2251	Production of child pornography
18 USC § 2252A(a)(2)	Receipt of child pornography
18 USC § 2252A(a)(5)	Possession of child pornography

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 11, 2020City and state: Detroit, Michigan
Complainant's signatureDavid Alley, Special Agent (HSI)
Printed name and title
Judge's signatureHon. R. Steven Whalen, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A COMPLAINT AND ARREST WARRANT

I, David Alley, being first duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with Homeland Security Investigations (HSI), of the United States Department of Homeland Security (DHS). I am assigned to the Special Agent in Charge (SAC), Office of Investigations (OI) in Detroit, Michigan with offices located at 477 Michigan Ave, Suite 1850, Detroit, Michigan. I have been employed with HSI since March, 2007. I have successfully completed the Criminal Investigator Training Program and the Immigration and Customs Enforcement Special Agent Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I have received a Bachelor's Degree in Criminal Justice from Michigan State University, as well as a Master's Degree in Criminal Justice from Michigan State University. I have successfully completed the Basic Computer Evidence Recovery Training (BCERT) at FLETC, Advanced Computer Evidence Recovery Training (ACERT) at the HSI Cyber Crimes Center and the Cyber Crime Center Mobile and Cellular Device Data Extraction course and possess an A+ certification. I am currently the Senior Defensive Tactics Instructor (SDTI) for HSI Detroit.

2. This affidavit is based on my personal knowledge, experience and training as well as on information obtained by me through investigative

observations and conversations with other HSI agents and agents from other law enforcement agencies. This affidavit does not set forth every fact resulting from this investigation; rather, it contains a summary of the investigation to date for the limited purpose of establishing probable cause to obtain a search warrant.

3. This affidavit is made in support of an application for an arrest warrant charging JOSTIN ARTHUR DESCO with violations of Title 18, United States Code, Section 2251 (production of child pornography), Section 2252A(a)(2) (receipt of child pornography), and Section 2252A(a)(5) (possession of child pornography).

PROBABLE CAUSE

4. Jostin Arthur DESCO has been identified through this investigation to be involved in the production, receipt, and possession of child pornography. DESCO has a prior conviction for child pornography crimes and is a registered sex offender in the state of Michigan. DESCO was convicted in May 2012, in Chippewa County, on two charges: Child Sexual Abusive Material/Activity-Distribution and Child Sexual Abusive Material- Possession.

The IMGSRC Lead from Canada

5. In June 2018, HSI Detroit received a referral from HSI Ottawa concerning an investigative report written by the Ontario Provincial Police (OPP). Law enforcement discovered an IMGSRC user with several purported

accounts. IMGSRG is a Russian-based hosting service that is used frequently by child pornographers to receive, exchange, and view child pornography.

6. One of the IMGSRG accounts, named “sandman13”, contained two folders named “My baby(please tribute)” and “Screenshots of my favorite boy(tribute)”. The first folder (“My baby(please tribute)”) contains approximately 12 images. It appears to be three identical sets of four images, totaling 12 images. One of them is a family portrait of a female posing with 3 young boys and a toddler girl. Today, your affiant met the woman in the family portrait, who described herself as DESCO’s “best friend.”

7. The other folder belonging to “sandman13” (called “Screenshots of my favorite boy(tribute)”) contained approximately 12 images of a boy posing in sexual stances, with a blue collar around his neck and a sexual device in one of his hands. OPP confirmed that these images are part of a known series of child pornography. A known series is one where law enforcement has identified the victim and the child pornography images are often frequently traded across the internet.

8. A subpoena return provided by the Australian Police revealed the IMGSRG account “sandman13” had two email accounts associated with it, including iamsandman13@yahoo.com.

9. In June 2020, Oath Holdings, Inc. (which operates Yahoo! email accounts), was subpoenaed for subscriber information and connection records for email account “iamsandman13@yahoo.com.” Oath Holdings, Inc. indicated the account was active, and the account holder name was Charlie Peters and the phone number associated with it was (248) 7**-8537. Login data revealed that there have been consistent logins throughout March 2020.

10. In June 2020, several IPs provided by Oath Holdings, Inc. were subpoenaed. Comcast Cable Communications, LLC, indicated that those IPs were accessed from the accounts of three subscribers. The first subscriber has the same name as the woman your Affiant met today who described herself as DESCO’s best friend with a service address in Flint, Michigan. That woman indicated that DESCO resided with her at the Flint address provided by Comcast. The second subscriber is Michael Trudell with a service address of 2**6 Walton Blvd in Waterford, Michigan (the “Walton Blvd Residence”). The third subscriber is Ricky DESCO with a service address of 1**18 Dixie Hwy Lot 94, Holly, MI 48442 (the “Dixie Hwy Residence”).

11. All three of these subscribers/locations have connections to DESCO. As indicated, the subscriber for the first subpoena return is the woman who described herself as DESCO’s best friend. She is the adult who appears in the image with her four children described in paragraph 6 above. The second

subscriber, Michael Trudell, is DESCO's stepfather. The third subscriber address was the Dixie Hwy Residence, the location where DESCO resides.

12. Therefore, there is probable cause to believe that the IMGSRG user "sandman13" is DESCO, who possessed child pornography through the IMGSRG.

The Toronto/San Antonio Lead

13. In December 2018, HSI Toronto received information from Toronto Police Service (TPS) regarding two minor victims. A TOR/Dark Web investigation revealed a Tor Board user posted under the topic "Naturist/Nude" a subtopic "KIK friend shared little brother". The topic was posted by the registered user "therealsandman" in October 2018. According to other HSI agents, the message was: "Been chatting with a boy who claims to be 16 and was able to get him yo(sp) share his little brother. Not much but it's a stat (sp) Hope everyone enjoys it." User "therealsandman" provided hyperlinks and a password, allowing users to extract the compressed files, once downloaded. Detectives downloaded the compressed files and used the password to extract the files. All of the files were named in a similar fashion and consistent with the KIK Interactive file-naming convention. Detectives downloaded seven images and one video of a child. The images were close-ups of the anal region of the child and in one

instance, his brother was squeezing the buttocks of the child. The video was of the same child naked while putting on pull ups.

14. In November 2018, TPS/HSI obtained a production order for KIK Interactive to determine the original sender and receiver of the files. KIK informed the aforementioned files were sent on October 23, 2018, by Kik account “not_enough_weekend” to Kik user “mclily13” who had an associated email address of hi5josie.k@gmail.com. Kik Interactive specified the contact between these two Kik users occurred with a direct connection. Google was subpoenaed for subscriber information and login records concerning email address hi5josie.k@gmail.com. In February 2019, Google indicated this email account has Josie Kennedy as subscriber and telephone number (248) 6**-7155 was associated with it.

15. In February 2019, HSI San Antonio subpoenaed Verizon for records concerning telephone number (248) 6**-7155. Verizon indicated the phone number resolved to a Charlie Peters at the Walton Blvd Residence. This is the address related to DESCO’s stepfather described paragraph 10 above.

16. Law enforcement successfully identified the victim in the videos posted by “therealsandman” on Kik. The brother of the victim was also identified. Both were interviewed by law enforcement as part of an HSI San Antonio investigation. The older brother told the investigators a Kik user “Mc

something” convinced him to send images of his younger sibling and asked him if he touched his brother. The older brother stated, “things got weird” and eventually removed the Kik application.

17. Based on the consistent use of the sandman moniker and the phone number connection to DESCO’s stepfather’s residence, there is probable cause to believe that DESCO was the sandman KiK user who received the child pornography from the San Antonio brothers described above.

FaceCast Lead

18. In April 2019, Waterford Police Department (WPD) received information concerning inappropriate online activity from a representant of sheepdogbloodhound.org, an internet safety organization. In March 2019, two users of a live video and chat mobile application called FaceCast identified themselves as being eight and ten years old. Another FaceCast user, using screen names of “lovelylilly” and “boy_named_liam” asked the eight-year-old boy to expose his penis and the 10 year old girl to expose her breasts. The sheepdogbloodhound.org representant stated the GPS data in the application indicated the user of both accounts (lovelylilly and boy_named_liam) was located at the Walton Blvd Residence in Waterford.

The Boston Lead

19. HSI Boston undercover Agents have been engaged in ongoing operations with international partners to identify high level offenders on various dark web child exploitation websites, to disrupt or dismantle dark web child exploitation websites and identify the location of children who are being sexually abused by offenders operating on the dark web. HSI Boston undercover Agents utilize a variety of techniques and strategies and partner with undercover officers around the world daily to accomplish the goals of the international working group.

20. HSI Boston developed information through undercover means relating to the dark net username **therealsandman**. The individual using the screen name **therealsandman** has accounts on approximately 9 darkweb sites dedicated to the sexual abuse of children. HSI Boston undercover agents reviewed messages from the individual using the screen name **therealsandman** and determined that his preferences include: “AoA 3-13, preferably boys but girls are cute too. HC, SC, camgs, fetish, i like it all.” I know that AoA means Age of Attraction.

21. A review of a law enforcement database of images and videos of child abuse material collected from a foreign law enforcement partner revealed that the individual using the screen name **therealsandman** has been connected to multiple series of child pornography. One of the series was called ACID WASH

and included images and videos of hands-on abuse by the individual using the screen name **therealsandman** and a prepubescent male child (hereinafter referred to as MV-1). The victim's name was given by **therealsandman** as well as the age of the child as being 8 years old. The name of MV-1 used by **therealsandman** is the same first name as one of the children of DESCO's best friend (see paragraph 6). Agents from Boston described some of the images from ACID WASH as follows:

559869396.mp4 – this video is approximately 18 seconds in length and is a prepubescent boy who is having his pants pulled down by the hand of an adult male, the adult male then begins to suck on the penis of the prepubescent boy. A part of the adult white male's face is seen in the video.

1228816973.jpg – This is an image of a prepubescent boy laying on the floor, an adult male's hand is pulling down the shorts of prepubescent boy, exposing his penis as the focus of the image.

1938479674.mp4 - this video is approximately 25 seconds in length and is an adult male with his erect penis pressing it against the exposed buttocks of a prepubescent boy

22.HSI Boston Agents located a message posted by the individual using the screen name **therealsandman** with regards to the above files:

Id like to introduce everyone to "[MV-1]" He is 7 years old. Here are a few short videos of him asleep + 4 pics. Hope everyone enjoys. More to come soon.

therealsandman then provided links to images and videos of child pornography.

23. You affiant has had the opportunity to view the contents of another folder belonging to **therealsandman** titled **THEREALSANDMAN KACPER**. This folder contains approximately 51 images and seventeen (17) videos. The subject of these videos appears to be a pre-pubescent male and many of the images and videos meet the federal definition of child pornography, to include videos of this child masturbating. One such video observed by your affiant is file 2020826-190501-720x1440. This video is 2 minutes and 6 seconds and appears to be a screen recording of a snapchat video call. The video depicts what appears to be a prepubescent male masturbating and a smaller video in the upper right hand corner of another male masturbating. At the 18 second mark, the call ends. The person making this video then goes to the main screen of their phone and opens the snapchat application. The person making the video appears to watch an unknown prepubescent male masturbate via snapchat. The initial call appears to resume at the 34 second mark of the video during which both the prepubescent male and the other male observed in the right hand corner of the video masturbate.

24. Agents from Boston HSI described the other folders belonging to **therealsandman** as involving child pornography involving other prepubescent victims.

25. HSI Boston Agents also reviewed messages the individual using the screen name **therealsandman** sent and received with other individuals in regards

to child abuse. In a December 2018 message, therealsandman told another user that he used the IMGSRG site to add images and videos and referenced images of young children. Law enforcement then sought to identify **therealsandman** on IMGSRG. The realsandman's profile included two email addresses, including Therealsandman1313@gmail.com.

26. On approximately September 2, 2020, HSI Boston Agents sent a summons to Google for the email account: Therealsandman1313@gmail.com. On approximately September 3, 2020, Google responded to the summons by providing the Google Account ID and login information, including:

2020-09-01 10:16:58 UTC	2601:40b:c201:5240:d9:ad47:db9:fb14
Login	
2020-08-31 02:16:01 UTC	2601:40b:c201:5240:d9:ad47:db9:fb14
Login	
2020-08-28 00:49:47 UTC	172.58.190.172
Login	
2020-08-25 03:48:29 UTC	172.58.190.135
Login	

27. On or about September 8, 2020, HSI Boston Agents sent a summons to Comcast for the IP address 2601:40b:c201:5240:d9:ad47:db9:fb14 for multiple dates and times received in the Google return. On approximately September 10, 2020, Comcast provided the subscriber information for the user of this IP address as Ricky DESCO at the Dixie Hwy Residence.

28. On or about September 2, 2020, HSI Boston Agents sent a summons to Facebook regarding the Facebook account for <https://www.facebook.com/lily.mccloud.507>. This account was found to be associated with the email account: therealsandman1313@gmail.com. On or about September 2, 2020, Facebook provided a response to the summons. Among other information provided were two cell phone numbers associated with the account, including 248-7**-8537. This is the same phone number associated with the Yahoo! account described in paragraph 9.

29. On or about September 8, 2020, HSI Boston Agents sent a summons to Cricket wireless for 1-248-7**-8537. On or about September 10, 2020, Cricket wireless provided the subscriber information as Jostin DESCO at the Walton Blvd Residence. The account was active from December 23, 2017, to May 27, 2019.

Search Warrant Execution

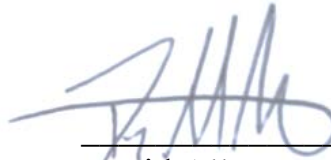
30. On September 11, 2020, Your Affiant and other agents from HSI Detroit executed a search warrant at the Dixie Hwy Residence. DESCO was present at the time of the search warrant execution. DESCO confirmed that he resides at both the Dixie Hwy Residence and the Walton Blvd Residence. DESCO's smart phone was seized. A forensic analysis of that device is ongoing.

31. Agents from HSI Boston had previously provided Your Affiant with an image taken from one of the videos in the ACID WASH series described in

paragraph 21 above. The image was cropped from an image of an adult male performing oral sex on a prepubescent minor. Only about half of the adult male's face is visible in the image. That partial image is consistent with the features of DESCO, who Your Affiant spent considerable time with today.

CONCLUSION

32. Based on the facts above, there is probable cause to believe that JOSTIN ARTHUR DESCO has possessed child pornography (in violation of 18 U.S.C. § 2252A(a)(5)), received child pornography (in violation of 18 U.S.C. § 2252A(a)(2)), and produced child pornography (in violation of 18 U.S.C. § 2251).



David Alley
Special Agent, Homeland Security

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. R. STEVEN WHALEN
UNITED STATES MAGISTRATE JUDGE

Date: September 11, 2020